



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5
11 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

0000006

EPA Region 5 Records Ctr.



225792

REPLY TO THE ATTENTION OF

MEMORANDUM

DATE: **MAR 01 2001**

SUBJECT: ACTION MEMORANDUM AMENDMENT- Determination of Presence of Off-Site Thorium Contaminated Associated with the Lindsay Light II Site/(OU3/North McClurg Court) and Determination of a Threat to Public Health or the Environment, Chicago, Cook County, Illinois (Site Spill ID #YT)

FROM: Verneta Simon and Fred Micke, On-Scene Coordinators
Emergency Response Branch - Section III

TO: William E. Muno, Director
Superfund Division

I. PURPOSE

The purpose of this Lindsay Light II Action Memorandum Amendment is to document the presence of off-site thorium contamination associated with the Lindsay Light II Site and the determination of a threat to public health and the environment. The off-site contamination is present in subsurface soils in the vacant lot located at 341 E. Ohio, Chicago, Illinois. The vacant lot is across the street and directly north of the Lindsay Light II Site that is located at 316 E. Illinois Street, Chicago, Illinois. This is an amendment to the April 22, 1996 Lindsay Light II Action Memorandum that documented the threat to public health and the environment posed by the presence of subsurface thorium contamination at the Lindsay Light II site. The Lindsay Light II Action Memoranda dated July 11, 1994, October 5, 1995, April 22, 1996, September 22, 1999, and March 28, 2000 and their administrative records are fully incorporated by reference into this document.

This vacant lot containing off-site thorium contamination is commonly known as the Grand McClurg, Ohio site or GMO site (see Figure 1). For accounting purposes, U.S. EPA designated this lot as Lindsay Light II Site/(OU3/North McClurg Court). The owner of the site is the Teachers' Retirement System of the State of Illinois. In April 2000, a potential purchaser of the site conducted limited radiological sampling and detected the thorium at levels that may present an imminent and substantial endangerment to human health and the environment. The property is presently a vacant parking lot that is to be developed into a mixed-used high-rise building.

II. SITE CONDITIONS AND BACKGROUND

CERCLIS ID # ILD 0000002212

This Site is not on the National Priorities List (NPL).

Beginning in about 1904 and continuing through the early 1930s, the Lindsay Light and Chemical Company manufactured gaslight mantles impregnated with thorium in the City of Chicago. The Lindsay Light operations originated at 22 W. Hubbard and later moved to 161 E. Grand and at 316 E. Illinois in Chicago, Illinois. The 316 E. Illinois address was the location where thorium was extracted from radioactive ores. The Hubbard and Grand sites are believed to be where thorium was used to manufacture mantles. These Lindsay Light refining and manufacturing processes created radioactive wastes that were disposed of in undetermined locations. Pursuant to an Administrative Order by Consent (AOC) authorized by Section 106 of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) dated January 27, 1994, the Lindsay Light II property owner, Chicago Dock & Canal Trust ("Chicago Dock") characterized the thorium contamination present within the Lindsay Light II site at 316 East Illinois. On June 6, 1996, U.S. EPA issued a Unilateral Administrative Order, Docket No. V-W-96-C-353, (the "UAO"). The UAO required the Respondents, Kerr McGee Corporation and Chicago Dock, to remove thorium contaminated materials from the Lindsay Light II site and to conduct off-site surveying and sampling as necessary and, at a minimum implement the standards of 40 CFR 192 if deemed necessary should contamination be discovered beyond current site boundaries. In early February 2000, contractors for the City of Chicago conducting a sewer line replacement project along Illinois Street adjacent to the Lindsay Light II site discovered off-site thorium contamination. Later that month, U.S. EPA discovered thorium contamination at the Grand Pier L.L.C. development across the street and directly west of the Lindsay Light II site. On March 29, 2000, U.S. EPA issued the First Amendment to the UAO that amended the Lindsay Light II Site definition to include property directly west of and across the street from the Site, and which was designated as RV3/North Columbus Drive.

Please refer to the previous Action Memoranda dated July 11, 1994, October 5, 1995, April 22, 1996, September 22, 1999, and March 28, 2000 for a description of site conditions and background.

From 1947 to 1988, the GMO property that is the subject of this Amendment was the headquarters and research center for Velsicol Corporation and later Sandoz Limited. In 1988, the buildings were razed and the land was used for a parking lot. U.S. EPA has no information that Chicago Dock formerly owned the GMO property.

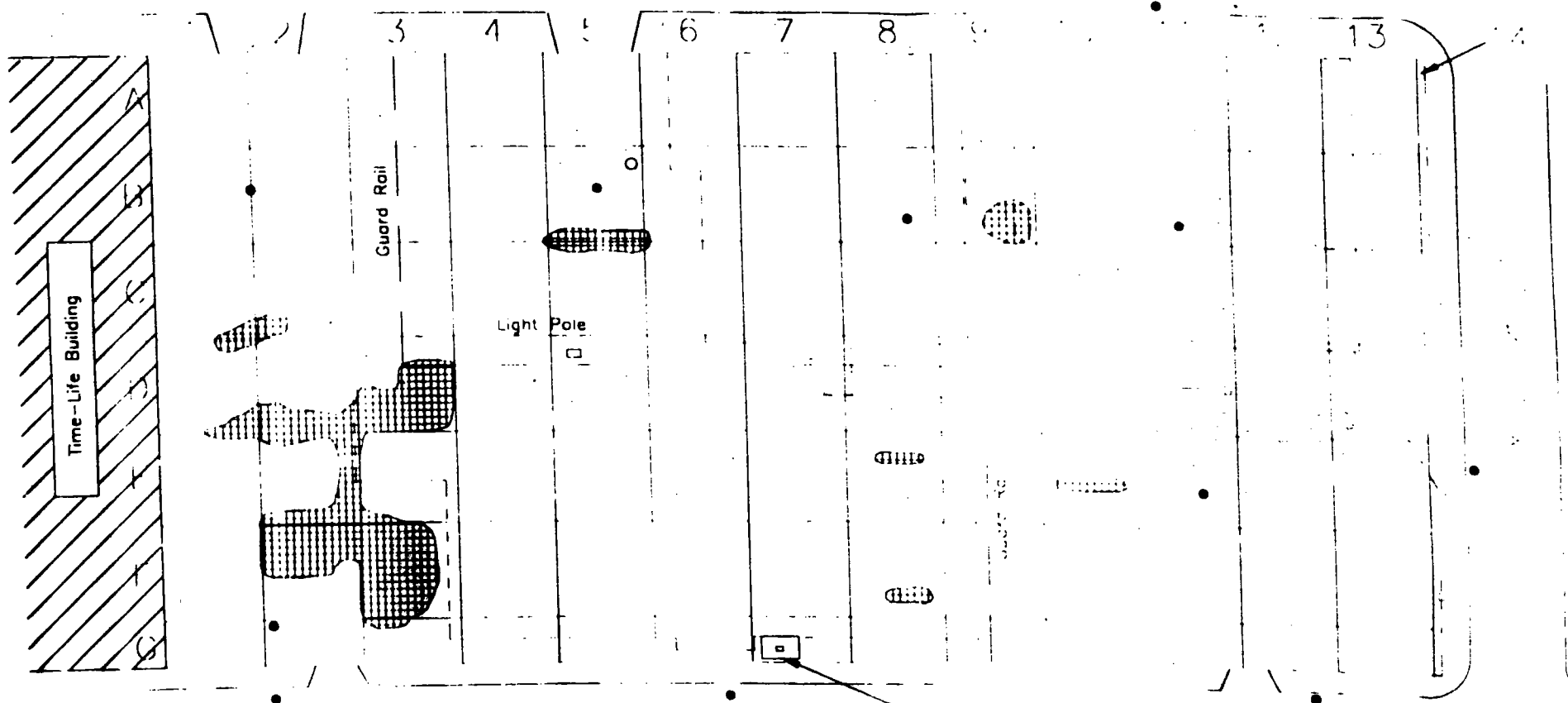
On May 31, 2000, TRS informed U.S. EPA that elevated levels of radioactive materials had been detected at the GMO property. This information was supported by the U.S. EPA Scanner Van radiation survey of the GMO property and by a gamma survey meter walkover by U.S. EPA staff. Following this disclosure, the property owner, Kerr-McGee L.L.C. and U.S. EPA met several times to discuss the extent of the contamination on the GMO property and make

preparations for its cleanup. Also, a letter was sent to the Potential Responsible Parties (PRPs) on July 13, 2000. This letter addressed the need to prepare a Work Plan for a Site Cleanup in accordance with the June 6, 1996 UAO..

An environmental justice (EJ) analysis was performed for this site and is contained in Attachment 7. In Illinois, the low-income percentage is 27 % and the minority percentage is 25 %. To meet EJ concern criteria, the area within 1 mile of this property must have a population that's twice the state low income percentage or/and twice that state minority percentage. That is, the area must be at least 54% low-income and/or 50% minority. At this site, the low-income percentage is 10.05 % and minority percentage is 19.64%, as determined by Arcview. Therefore, this site does not meet the region's EJ criteria based on the demographics as identified in "Region 5 Interim Guidelines for Identifying and Addressing a Potential EJ Case, June 1998".

Ohio Street

North



LEGEND



Exposure/Dose Rate Location within 10 Meter Grid



Elevated Gamma Radiation Area

Approximate Property Boundary

Approximate Location of Former Buildings



Catch Basin

10 Meter Grid Boundary

Grand Avenue

Existing Utility Vault
17' x 10' x 10' deep

III. THREAT TO PUBLIC HEALTH OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

Conditions at the Lindsay Light II Site/(OU3/North McClurg Court) may pose an imminent and substantial endangerment to public health or welfare or the environment, based upon factors set forth in the National Contingency Plan (NCP), 40 CFR 300.415 (b)(2). These factors include:

a) actual or potential exposure to nearby populations, animals, or the food chain from hazardous substances or pollutants or contaminants:

This factor is present at the site due to the presence of elevated radiation readings that were documented in the May 2000 report submitted by the owner of the property. A copy of this report is contained in the Administrative Record. Readings as high as 95,000 counts per minute with a Ludlum Model 2-21 Sodium Iodide Detector. Counts per a minute in an uncontaminated area for the Ludlum detector are generally about 7,000 counts per minute in this area.

The highest readings found on the property correspond to a cancer risk of 1×10^{-5} if persons are stationed over the contaminated areas for 22.5 minutes per day for a standard 250 day work year.

In addition, TRS, the property owner, intends to commence cleanup activities at the beginning of the year 2001 construction season which is approximately March 1, 2001. The removal of the asphalt covering the property and excavation activities also may result in inhalation, ingestion or direct contact contamination from thorium contaminants by workers or the public.

b) high levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface, that may migrate:

Soil concentrations as high as 3020 picocuries per gram (pCi/g) for thorium-232 and 2880 pCi/g for thorium-228, both including background, were measured in site soils. This would correspond, on average, to about 2950 pCi/g for radium-228. Radium-226 levels were not reported but would be non-zero. Thus, the total radium concentration in soil (radium-226 + radium-228) would, minimally, be on the order of 2950 pCi/g. For comparison purposes, the clean-up level applied to the site directly south of the Site was 7.1 pCi/g total radium, including background.

The property owner, intends to commence cleanup activities at the beginning of the year 2001 construction season which is approximately March 1, 2001. The removal of the asphalt covering the property and excavation activities may expose thorium contaminated soil. If soils are not managed and disposed of in accordance with state and federal environmental requirements, uncontrolled exposure to and uncontrolled dispersal of radioactive materials might occur.

c) other situations or factors which may pose threats to public health or welfare or the environment:

Prior to the March 29, 2000 amendment to the 1996 UAO, thorium contaminated soils from the Grand Pier property were improperly excavated and disposed of at a landfill 35 miles from the Lindsay Light II site. If the thorium contamination present at the GMO property is not removed in accordance with the 1996 UAO provisions, thorium contaminated soils may not be properly managed and may result in excess radiation exposure to workers and the public and the spreading of contaminated soil beyond the site boundaries.

IV. ENDANGERMENT DETERMINATION

Given the nature of the Site, the nature of the contaminants - radioactive materials that cause external exposure, inhalation, ingestion, and direct contact hazards, as described in Sections II and III, the actual or threatened releases of hazardous substances from this Site, if not addressed by implementing the response action described in this Action Memorandum Amendment, may pose an imminent and substantial endangerment to public health, or welfare, or the environment due to these radioactive materials.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

Pursuant to the 1996 UAO as amended, the PRP will fully remediate the site until maximum protectiveness of the human health and the environment is achieved. This will involve at a minimum the following actions:

- 1) Develop a Work Plan for the radiological assessment of the site.
- 2) Develop and implement a site radiological health and safety plan.
- 3) Develop and implement an air radiological monitoring plan.
- 4) Develop and implement site security measures, including radiological surveillance at the perimeter of radiological exclusion zones.
- 5) Conduct land surveying to the extent necessary to establish a grid system to locate all property boundaries, special features (pipes, storage tanks, etc.), and sample locations.
- 6) Conduct off-site radiological surveillance, gamma count rate measurements and soil sampling as necessary and, at a minimum implement 40 CFR 192 if deemed necessary should contamination be discovered within current site boundaries.

- 7) Place borings in critical locations (grid corners, high exposure rate areas, special features, etc.) for the purpose of measuring subsurface gamma count rate radiation levels. Measurements shall be recorded at each 6 inch depth until the natural soils are reached or gamma count rate radiation levels reach background, whichever is the greatest depth.
- 8) Collect soil samples from the borings and analyze for radionuclide identity and concentration and for RCRA characteristics. These results will then be used by the PRP to correlate subsurface radiation levels and radionuclide content, and to determine the disposal facility.
- 9) Conduct off-site radiological surveillance, gamma count rate measurements and soil sampling as necessary and, at a minimum implement 40 CFR 192 if deemed necessary should contamination be discovered beyond current site boundaries.
- 10) Based upon soil results, remove, transport and dispose of all characterized or identified hazardous substances, pollutants, wastes or contaminants at a RCRA/CERCLA approved disposal facility in accordance with the U.S. EPA off-site rule.
- 11) The soil clean-up criterion is 7.1 picoCuries per gram (pCi/g) total radium (Ra-226 + Ra-228) including background, unless analyses indicates the existence of additional contaminants, hazardous substances, pollutants or waste.

The OSC has begun planning for the provision of post-removal site control, consistent with the provisions of Section 300.415(k) of the NCP. However, the nature of future response actions should eliminate all exposure threats, which should minimize the need for on-site post-removal site control.

The response actions described in this memorandum directly address actual or threatened releases of hazardous substances, pollutants or contaminants at the facility which may pose an imminent and substantial endangerment to public health and safety, and to the environment. These response actions do not impose a burden on the affected property disproportionate to the extent to which that property contributes to the conditions being addressed.

Applicable or Relevant and Appropriate Requirements (ARARS)

All applicable or relevant and appropriate requirements (ARARS) of Federal law will be complied with to the extent practicable. In a letter dated November 25, 1995 the Illinois Department of Nuclear Safety (IDNS) reclassified the radioactive material found there from "source" material to 11(e)2 "by-product" material. See Lindsay Light II Administrative Record Update #4, Documents 1- 4.

In accordance with the revised NCP, Section 300.825(a)(1), the response from the State to the request for ARARs was added to the administrative record for this site. See Lindsay Light II Administrative Record Update #4, Document # 4.

VI. CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED

Delayed or non-action may result in increased likelihood of external exposure, inhalation, ingestion or direct contact to human populations accessing and working on the site. Also, since there is no threshold for radiological risk, additional exposure to radiological materials will increase the cancer risk. Delay may increase the chance of spreading of contaminants beyond site boundaries.

VII. OUTSTANDING POLICY ISSUES

None.

IX. ENFORCEMENT

For administrative purposes, information concerning confidential enforcement strategy for this site is contained in the Enforcement Confidential Addendum.

X. RECOMMENDATION

This decision document represents the determination that the thorium contamination present at the GMO property is Lindsay Light II off-site contamination (Lindsay Light II Site/OU3 North McClurg Court), as defined in and subject to the Lindsay Light II Unilateral Administrative Order dated June 6, 1996. This decision document also represents the selected removal action for the Lindsay Light II Site/OU3/North McClurg Court), in Chicago, Illinois. This decision document was developed in accordance with CERCLA, as amended, and is not inconsistent with the NCP. This decision document is based upon the Administrative Record for this site. Conditions at the site meet the NCP Section 300.415(b)(2) criteria for a removal action.

APPROVE:
DIVISION

Richard C. Karl

DIRECTOR, SUPERFUND

DISAPPROVE: _____
DIVISION

DIRECTOR, SUPERFUND

Attachments: Enforcement Confidential Addendum

1. Action Memorandum dated March 28, 2000
2. Action Memorandum dated September 22, 1999
3. Right-of-Way Agreement
4. Action Memorandum dated April 22, 1996
5. Action Memorandum dated October 5, 1995
6. Action Memorandum dated July 11, 1994
7. Environmental Justice Analysis
8. Index to the Administrative Record

cc: Kevin Mould, USEPA, OERR,
Michael Chezik, U.S. Department of Interior
Tom Skinner, Director, Illinois Environmental Protection Agency, **w/o enforcement
addendum**
Steve Davis, Illinois Department of Natural Resources, **w/o enforcement addendum**
Thomas W. Ortziger, Illinois Department of Nuclear Safety, **w/o enforcement addendum**
William F. Abolt, Commissioner Department of Environment, City of Chicago, **w/o
enforcement addendum**

PAGE 10

BCC PAGE

REDACTED

NOT RELEVANT TO THE SELECTION OF THE REMOVAL ACTION

ENFORCEMENT CONFIDENTIAL ADDENDUM

REDACTED

(3 PAGES)

NOT RELEVANT TO THE SELECTION OF THE REMOVAL ACTION

ATTACHMENTS 1 - 7

SEE

ADMINISTRATIVE RECORD FOR LINDSAY LIGHT II

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ATTACHMENT 8

U.S. ENVIRONMENTAL PROTECTION AGENCY
REMOVAL ACTION

ADMINISTRATIVE RECORD
FOR
LINDSAY LIGHT II SITE
CHICAGO, ILLINOIS

ORIGINAL
MAY 2, 1994

<u>NO.</u>	<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
1	06/21/93	Karl, R., U.S. EPA	Klinger, J., Illinois Dept. of Nuclear Safety	Letter re: Illinois Dept. of Nuclear Safety	1
2	08/18/93	Kouris, T., Ecology and	Pfundheller, J., U.S. EPA	Letter re: Site Assess- ment	4
3	08/26/93	TMA Eberline	Ecology and Environment, Inc.	Thermoluminescent Dosimeter Badges Data	3
4	08/27/93	Klinger, J., Illinois	Karl, R., U.S. EPA	Response to U.S. EPA Letter Dated 6/21/93	2
5	01/27/94	Muno, W., U.S. EPA	Chicago Dock & Canal Trust	Administrative Order by Consent	16
6	07/11/94	Simon, V., U.S. EPA	Muno, W., U.S. EPA	Action Memorandum	12

UPDATE #1
SEPTEMBER 18, 1995

1	09/00/93	Rogers & Associates Engineering Corporation	Chicago Dock & Canal Trust	Work Plan for Character- ization of Radioactive Contamination, 316 East Illinois St., Chicago, Illinois: Appendix E, Supplemental; Other Sampling	17
2	10/05/95	Simon, V., U.S. EPA	Muno, W., U.S. EPA	Action Memorandum: Determination of Threat to Public Health or the Environment at the Lindsay Light II Site	22

<u>NO.</u>	<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
<u>UPDATE #2 (REVISED)</u> <u>APRIL 1, 1996</u>					
1	04/22/96	Simon, V., U.S. EPA	Muno, W., U.S. EPA	Action Memorandum: Determination of Threat to Public Health and the Environment at the Lindsay Light II Site	40
<u>UPDATE #3</u> <u>JUNE 3, 1996</u>					
1	10/27/95	STS Consultants, Ltd.	U.S. EPA	The Chicago Dock & Canal Trust Report for Characterization Inves- tigation: Gamma Radiation Survey, Lindsay Light II Site w/Attachments A-E (3 Volumes)	1331
<u>UPDATE #4</u> <u>JUNE 24, 1996</u>					
1	10/25/96	Klinger, S., Illinois Dept. of Nuclear Safety	Thompson, R., U.S. EPA	Letter re: Classification of Radioactive Material at Lindsay Light II	1
2	05/30/96	Weber, M., Illinois EPA	Simon, V., U.S. EPA	Letter re: Coordination of Removal Effort and Identification of Appli- cable or Relevant and Appropriate Requirements (ARARs) for the Lindsay Light II Site	3
3	06/04/96	Allen, R., Illinois Dept. of Nuclear Safety	Simon, V., U.S. EPA	Letter re: Identification of Applicable or Relevant and Appropriate Require- ments for the Lindsay Light II Site w/Attachment (Action Criteria for Superfund Removal Actions at the Kerr-McGee Resi- dential Areas Site, West Chicago, IL)	21

<u>NO.</u>	<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
4	06/13/96	Morin, C., Illinois EPA	Simon, V., U.S. EPA	Letter re: Response to June 2 Letter Regarding ARARs for the Lindsay Light II Site w/Attachment (List of State and Federal ARARs and TCBs re: Inclusion of ARARs in the Administrative Record)	9

UPDATE #5
SEPTEMBER 22, 1999

1	02/12/98	U.S. EPA/ OERR	U.S. EPA	Memo re: Use of Soil Cleanup Criteria in 40 CFR Part 192 as Remediation Goals for CERCLA sites (OERR Directive No. 9200.4-25)	8
2	09/22/99	Simon, V. & F. Micker; U.S. EPA	Muno, W., U.S. EPA	Action Memorandum Amendment: Determination that Specific Institutional Controls are Adequate to Abate the Threat to Public Health and the Environment from the Thorium Under the Rights-Of-Way Adjacent to the Lindsay Light II Site (PORTIONS OF THIS DOCUMENT HAVE BEEN REDACTED)	53

UPDATE #6
OCTOBER 18, 1999

1	09/27/99	City of Chicago	U.S. EPA	Residual Radioactive Waste Right-of-Way Agreement w/Attachments A-F	103
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UPDATE #7
LINDSAY LIGHT II (RV3 NORTH COLUMBUS DRIVE) SITE
MARCH 28, 2000

1	06/21/93	Simon, V., U.S. EPA	Steele, R., 161 E. Grand Associates	Letter re: U.S. EPA/IDNS Verification of Radioactivity at the 161 E. Grand Building and Request to Install Thermoluminescent Dosimeter (TLD) Badges in the Building (Lindsay Light II Site)	2
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<u>NO.</u>	<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
1	09/00/93	U.S. EPA	File	TLD Data, ATSDR Recommendations and Gamma Survey Maps of Lindsay Light Building for the Lindsay Light I Site	16
3	10/22/93	Traub, J., U.S. EPA	Steele, R., 161 E. Grand Associates	Letter re: TLD Results for the 161 E. Grand Building (Lindsay Light I Site)	9
4	06/07/94	Anderson, G. U.S. DOL OSHA	Simon, V., U.S. EPA	Letter re: OSHA's May 11, 1994 Inspection at 161 E. Grand Avenue (Lindsay Light I Site)	5
5	07/09/96	Steele, R., 161 E. Grand Associates	Simon, V., U.S. EPA	FAX Transmission re: Final OSHA Ruling and Data for the 106 E. Grand Building	4
6	08/12/96	Charp, P., USDHHS/ USPHS/ ATSDR	Anderson, G., U.S. DOL/ OSHA	Letter re: ATSDR's Concern for Radiological Contamination at 161 E. Grand Avenue (Lindsay Light I Site)	3
7	08/20/96	Charp, P., USDHHS/ USPHS/ ATSDR	Anderson, G., U.S. DOL/ OSHA	Letter re: Corrections to ATSDR's August 12, 1996 Letter Concerning Radiological Contamination at 161 E. Grand Avenue (Light I Site)	1
8	08/22/97	U.S. EPA/ OERR	U.S. EPA	Memorandum: Establishment of Cleanup Levels for CERCLA Sites with Radioactive Contamination (OSWER Directive 9200.4-18)	20
9	02/12/98	U.S. EPA/ OERR	U.S. EPA	Memorandum: Use of Soil Cleanup Criteria in 40 CFR Part 192 as Remediation Goals for CERCLA Sites (Directive 9200.4-25)	6

<u>NO.</u>	<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
10	10/27/99	City of Chicago	Obligors	Right of Way Agreement for the Rights of Way Adjacent to 316 E. Illinois Street Between the City of Chicago, River East and Kerr-McGee Chemical	10
11	10/20/99	Prasad, N., City of Chicago/ Department of Environment	Iacullo, C., City of Chicago/ Department of Transportation	Memorandum re: Right of Way Agreement for the Rights of Way Adjacent to 316 E. Illinois Street	1
12	01/00/00	Metro Commercial Real Estate/ R.M. Chin & Associates		Development Brochure for the Grand Pier Center	22
13	01/21/00	Osakada, S., City of Chicago/ Department of Sewers	Rhymes, B., City of Chicago/ Department of Sewers	Memorandum re: Illinois Street Sewer from Columbus Drive to McClurg Court	1
14	01/24/00	City of Chicago/ Department of Sewers	File	Permit Application for Work to be Performed on the Main Sewer at Illinois Street from Columbus Drive to McClurg Court	1
15	02/23/00	Simon, V., U.S. EPA	Chin, R., R.M. Chin & Associates	Letter re: Lindsay Light II Site and Grand Pier Development w/Attached Consent for Access to Property Form	5
16	02/28/00	Chin, R., R.M. Chin & Associates	U.S. EPA	Signed Consent for Access to Property Form for the 2XX Block of Illinois Street	1
17	03/02/00	U.S. EPA	File	Table: Grand Pier Center Off Site Disposal (Semi Loads Hauled Off Site) for the Period January 14 - February 29, 2000	1

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18	03/16/00	Micke, F., U.S. EPA	Witte, M., R.M. Chin & Associates	Letter re: Work to be Conducted Pursuant to the June 6, 1996 Unilateral Administrative Order at the Lindsay Light II (RV3 North Columbus Drive) Site	3
19	03/17/00	Karl, R., U.S. EPA	Chin, R., Grand Pier Center	Letter re: General Notice of Potential Liability for the Lindsay Light II (RV3 North Columbus Drive) Site	4
20	03/21/00	U.S. EPA	File	Tables: Comparison of Sample Results Related to the North Columbus Drive Site	6
21	03/22/00	Pissman, M., Mayer, Brown & Platt	Regel, D., U.S. EPA	Letter re: Grand Pier's Response to U.S. EPA's March 17, 2000 Notice Letter for the Lindsay Light II (RV3 North Columbus Drive) Site	2
22	03/23/00	Chin, R., R.M. Chin & Associates	U.S. EPA	Signed Consent for Access to Property Form for 200 East Illinois Street	1
23	03/28/00	Simon, V. & F. Micke; U.S. EPA	Muno, W., U.S. EPA	Action Memorandum: Determination of Threat to Public Health or the Environment at the Lindsay Light II (RV3 North Columbus Drive) Site	121

UPDATE #8
LINDSAY LIGHT II (OPERABLE UNIT #3/NORTH MCCLURG COURT) SITE
MARCH 1, 2001

<u>NO.</u>	<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
1	05/31/00	Ramsey, T., Piper, Marbury, Rudnick & Wolfe	Fulghum, M., U.S. EPA	May 2000 Report: Summary of Radiological Survey for the Time-Life Property w/ Attached Cover Letter	53

<u>NO.</u>	<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
2	10/27/00	Golub, L., Golub & Company	Pabian, T., Capital Associates Realty Advisors	Letter re: Cleanup Plan for the Time-Life Site of Cleanup Activities	1
3	12/20/00	Ramsey, T., Piper, Marbury, Rudnick & Wolfe	Fulghum, M., U.S. EPA	Fax Transmission re: Golub's Redevelopment Plans for the GMO (Grand, McClurg, Ohio) Site	2
4	01/25/01	Koh, B., B. Koh & Associates, Inc.	Simon, V., U.S. EPA	Letter re: Gamma Spectra Results for the Time- Life Property w/Attached Sampling Data	35
5	02/23/01	Ramsey, T., Piper, Marbury, Rudnick & Wolfe	Martwick, C., U.S. EPA	Letter re: U.S. EPA's Regulatory Requirements and Determinations for the GMO Site	2
6	00/00/00	Simon, V. & F. Micke; U.S. EPA	Muno, W., U.S. EPA	Action Memorandum Amend- ment: Determination of Presence of Off-Site Thorium Contamination Associated with the Lindsay Light II Site (OU3/North McClurg Court) and Determination of a Threat to Public Health or the Environment (PENDING)	